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ABSTRACT

Although self-determination funds in fiscal year 1977 accounted for about 25 percent of the Bureau of Indian Affairs (BIA) budget for the operation of Indian programs, the BIA has not adequately supervised tribal performance under these contracts and grants. Questionable use of funds, incorrect interpretations of regulations, inadequate criteria to measure performance, conflicts of interest, and inadequacy of BIA guidelines in defining duties of employees were identified as contributing factors in a study that included trips to BIA headquarters, area offices and agencies, visits to reservations, and interviews with BIA and tribal officials. The BIA should develop management reporting systems to help monitor and control self-determination contracts, grants, and training and technical assistance activities. BIA policies, regulations, guidelines, and practices should also be revised to (1) prohibit award of contracts in which the starting date precedes the date of award; (2) establish specific criteria for measuring performance; (3) require supervision of contracts and grants by adequately trained area level officers whose responsibilities have been clearly defined; and (4) prevent self determination training and technical assistance funds from being used for assistance that does not help tribes to develop the capability to negotiate and administer self-determination contracts or grants or to improve their capabilities to fully exercise their self-determination options. (DS)

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JAN 1979

REPORT OF THE COMPTROLLER GENERAL OF THE UNITED STATES

ED165959

Controls Are Needed Over Indian Self-Determination Contracts, Grants, And Training And Technical Assistance Activities To Insure Required Services Are Provided To Indians

The Bureau of Indian Affairs does not have adequate control over contracts, grants, and training and technical assistance activities authorized by Title I of the Indian Self-Determination and Education Assistance Act.

The Bureau should establish policies and procedures that will make sure that

--contracts and grant agreements include adequate criteria against which to measure tribal performance;

--contract and grant proposals are submitted and approved before their starting dates;

--contracts and grants are adequately supervised; and

--information is reported that can be used to help monitor and control self-determination contracts, grants, and training and technical assistance activities.

U S DEPARTMENT OF HEALTH, EDUCATION & WELFARE
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CED-78-44

FEBRUARY 15, 1978

RC 011142

COMPTROLLER GENERAL OF THE UNITED STATES
WASHINGTON, D.C. 20548

B-114868

The Honorable Robert C. Byrd, Chairman
Subcommittee on the Department of
Interior and Related Agencies
Committee on Appropriations
United States Senate

Dear Mr. Chairman:

This is one of a series of reports in response to your request of August 9, 1977, asking us to make a comprehensive review of the Bureau of Indian Affairs programs and processes. This report points out that the Bureau had not met its congressional mandate to supervise tribal performance even though self-determination contracts and grants in fiscal year 1977 accounted for about 25 percent of its budget for the operation of Indian programs. It also points out that the Bureau uses training and technical assistance funds for purposes other than those related to implementing the Indian Self-Determination and Education Assistance Act.

As requested by your office, we have not obtained written agency comments. However, we have informally discussed our findings with agency officials.

As arranged with your office, unless you publicly announce its contents earlier, we plan no further distribution of this report until 10 days from the date of the report. At that time, we will send copies to interested parties and make copies available to others on request.

Sincerely yours,

Comptroller General
of the United States

REPORT TO THE SUBCOMMITTEE ON THE DEPARTMENT OF INTERIOR AND RELATED AGENCIES, SENATE COMMITTEE ON APPROPRIATIONS

CONTROLS ARE NEEDED OVER INDIAN SELF-DETERMINATION CONTRACTS, GRANTS, AND TRAINING AND TECHNICAL ASSISTANCE ACTIVITIES TO INSURE REQUIRED SERVICES ARE PROVIDED TO INDIANS

D I G E S T

The Bureau of Indian Affairs, Department of the Interior, does not have adequate controls over self-determination contracts and grants awarded to Indian tribes or the related training and technical assistance activities. Thus, the Bureau does not know whether the tribes are providing required services to Indians or if training and technical assistance funds are being properly used. (See pp. 4 and 16.)

CONTROLS NEEDED OVER CONTRACTS AND GRANTS

Neither the Indian Self-Determination Act nor regulations define the extent of control the Bureau should exercise over programs and services administered by tribes under contracts and grant agreements. However, the act clearly mandates that tribal performance under contracts and grants must be supervised. The Bureau has not met this mandate even though self-determination contracts and grants in fiscal year 1977 accounted for about 25 percent of its budget for the operation of Indian programs.

Contracts and grants were awarded retroactively--that is, the starting dates preceded the dates of award--and adequate criteria against which to measure tribal performance were not always included. Supervision and monitoring of contracts and grants was not effective in identifying and helping improve tribal performance. (See p. 4.) It is difficult to identify individual contracts and grants and how training and technical assistance funds are being used because the Bureau has not developed a management

reporting system to help monitor and control these activities. (See pp. 4 and 18.)

Bureau guidelines do not adequately define the duties of employees assigned to supervise and monitor contracts. This fact along with the designation of employees at the agency 1/ level has created a situation that makes it difficult for the employees to effectively monitor tribal performance. They are required to supervise and monitor contracts and grants as part-time, collateral duties with very little training. They are not able to maintain the independence needed to effectively supervise and monitor tribal performance because they work for or with the tribes on many other matters. (See pp. 6 to 8.)

On October 1, 1976, the Bureau awarded a $4 million contract to a tribe to operate a higher education scholarship program in fiscal year 1977, even though tribal auditors reported that the tribe had not been able to properly operate the program. The auditors raised serious questions concerning negligence and mismanagement in the handling of funds provided to the tribe. They reported that about $161,300 in overpayments had been made to Indian students as well as other management deficiencies. In spite of the tribe's past performance, the Bureau as of November 1977 had not taken steps to determine current tribal performance or whether the deficiencies had been corrected. The Bureau extended the contract for fiscal year 1978 at an estimated cost of $3.8 million. (See pp. 9 to 11.)

The Secretary of the Interior needs to correct the management deficiencies found in this and other cases.

1/Agencies are generally located near tribal offices and handle the area office's day-to-day contact with one or more tribes.

CONTROLS NEEDED OVER TRAINING AND TECHNICAL ASSISTANCE ACTIVITIES

The act intended that training and technical assistance to tribes be directed toward (1) increasing tribal capability to contract for programs now provided by the Bureau and (2) helping tribes overcome problems that could cause denial of their requests for contracts. The Bureau is also authorized to use training and technical assistance funds for activities related to implementing the act such as training of Bureau and tribal employees.

However, the Bureau permits the use of such funds for other purposes. In one instance an area office awarded a contract to a university to provide technical assistance to Indian tribes. The funds under the contract were used to improve economic development enterprises. A headquarters official advised the area office in December 1977 that the funds should not have been used for this purpose. However, Bureau guidelines were not clear and as a result, the area office applied a very liberal interpretation of how technical assistance funds could be used. (See pp. 19 to 20.)

Concerted effort is needed to develop adequate controls over Indian self-determination contracts, grants, and training and technical assistance activities. Controls are necessary to make sure that (1) the service to be rendered to Indian beneficiaries of the particular program or function operated by tribes under contracts or grant agreements is satisfactory, (2) protection of trust resources is assured, and (3) the program or function is properly operated and completed.

RECOMMENDATIONS

The Secretary of the Interior should direct the Assistant Secretary for Indian Affairs to develop a management reporting system to help monitor and control self-determination contracts, grants, and training and technical assistance activities. The Assistant

Secretary should also be directed to revise the Bureau's policies, regulations, procedures, and practices as appropriate to:

--Prohibit award of contracts in which the starting date precedes the date of award.

--Require that all contracts and grants include specific criteria against which to measure performance.

--Require that contracts and grants are effectively supervised and monitored by contract and grant officers. This should include (1) designation of full-time contract and grant officer representatives at the area level rather than agency level in order to remove conflict of interest, (2) clear description of contract and grant officer representative responsibilities, and (3) adequate training of contract and grant officer representatives.

--Prevent training and technical assistance funds appropriated for self-determination purposes from being used for assistance that does not help tribes (1) develop the ability to negotiate and administer self-determination contracts and grants or (2) improve their managerial and governmental capabilities required to fully exercise their self-determination options. (See pp. 15 and 21.)

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ABBREVIATIONS

BIA	Bureau of Indian Affairs
GAO	General Accounting Office

CHAPTER 1

INTRODUCTION

On August 9, 1977, the Chairman, Subcommittee on the Department of Interior and Related Agencies, Senate Committee on Appropriations, requested that we make a comprehensive review of Bureau of Indian Affairs (BIA), Department of the Interior, programs and report the results to him by February 15, 1978. This is one of a series of reports in response to that request. This report presents the results of our evaluation of the policies, procedures, and practices followed by BIA in implementing Title I of the Indian Self-Determination and Education Assistance Act, Public Law 93-638 (25 U.S.C. 450), as they relate to controls over self-determination contracts and grants, tribal overhead expenses, and training and technical assistance funds.

SELF-DETERMINATION POLICY

In 1970 the President in a message to the Congress on American Indians called for a new American Indian policy--"self-determination without termination." This policy was offered as an alternative to past Federal policy of terminating responsibilities and services to Indian tribes.

Following the President's message of July 1970, BIA attempted to promote greater self-determination by Indian tribes by encouraging tribes to contract for the authority and responsibility to plan, conduct, and administer programs and services previously provided by BIA. As a result of BIA efforts, several hundred contracts were awarded to tribes under the Buy Indian Act of 1910 (25 U.S.C. 47) to administer programs and services previously administered by BIA. However, the Buy Indian Act fell short of assuring the degree of tribal control visualized by the Congress, which in Senate Report 93-762 on S.1071 (the bill that became P.L. 93-638), stated that "a more flexible authority is needed in order to give substance and credibility to the concept of Indian self-determination."

On January 4, 1975, the policy proposed in the President's message became law with the enactment of the Indian Self-Determination and Education Assistance Act. In passing Title I, referred to as the Indian Self-Determination Act, the Congress declared its commitment to maintain the Federal Government's unique and continuing relationship with and responsibility to the Indian people by:

"* * * the establishment of a meaningful Indian self-determination policy which will permit an orderly transition from Federal domination of programs for and services to Indians to effective and meaningful participation by the Indian people in the planning, conduct and administration of those programs and services."

The act called for BIA to contract with Indian tribes to assume responsibility for planning, conducting, and administering programs and services provided by BIA. Section 102 of the act directs the Secretary of the Interior, upon request of any Indian tribe, to award a contract to operate programs, or portions thereof, which the Secretary is authorized to administer for the benefit of Indians. The Secretary may decline to enter into any contract if he finds that:

"* * * (1) the service to be rendered to the Indian beneficiaries of the particular program or function to be contracted will not be satisfactory; (2) adequate protection of trust resources is not assured, or (3) the proposed project or function to be contracted for cannot be properly completed or maintained by the proposed contract * * *."

Section 104(a) of the act authorizes the Secretary to make contracts or grants to tribal organizations to help them develop the capability to operate programs they might eventually contract under the act. The Senate Committee on Interior and Insular Affairs stated in Senate Report 93-762 that these grants would be used:

"* * * (1) to undertake orderly planning for the takeover of the more complex federally-operated programs; (2) to train Indians to assume managerial and technical positions once the tribe has assumed control and management of Federal programs; and (3) to finance a thorough evaluation of performance following a reasonable period of time in which a former federally-controlled program has been administered by a tribe under contract."

According to information developed by BIA for the Senate Select Committee on Indian Affairs, as of March 31, 1977, BIA had entered into 638 contracts with various Indian groups or tribes. The dollar value of all contracts totaled about $126.6 million. Of this amount education accounted for $41 million; social services, $34.4 million;

employment assistance, $3.6 million; law and order, $4.6 million; housing, $2.3 million; natural resources, $3.5 million; forestry, $1.5 million; and employment training (Indian Action Team Program), $19.5 million. BIA allocated funds for grants, tribal overhead expenses, and training and technical assistance as follows.

	FY 1976 (note a)	FY 1977	FY 1978
Grants	$ 7,800,000	$16,500,000	$17,500,000
Contract support	12,000,000	9,700,000	9,700,000
Training and technical assistance	1,100,000	4,500,000	5,500,000
Total	$20,900,000	$30,700,000	$32,700,000

a/Includes transitional quarter

Self-determination activities are administered by BIA's headquarters office in Washington, D.C., and 12 area and 82 agency offices. Each agency office, which generally reports to an area office, is responsible for BIA's day-to-day contact with one or more tribes.

SCOPE OF REVIEW

Our review was made at BIA headquarters offices in Washington, D.C.; BIA's Navajo, Phoenix, and Portland area offices located in Window Rock, Arizona, and Gallup, New Mexico; Phoenix, Arizona; and Portland, Oregon, respectively; and BIA's Pima and Western Washington agency offices located at Sacaton, Arizona, and Everett, Washington. We also visited the Gila River Indian Community in Arizona, the Lummi tribe in Washington, and the Navajo tribe in Arizona.

We reviewed applicable policies, regulations, procedures, and practices pertaining to contract and grant supervison, tribal overhead rate determination, and use of training and technical assistance funds. We also interviewed BIA and tribal officials concerning these matters.

CHAPTER 2

INADEQUATE CONTROLS OVER CONTRACTS AND GRANTS

BIA does not have adequate controls over contracts and grants awarded to Indian tribes, and thus it does not know whether tribes provided required services to Indians or if funds were properly expended. As a result, contracts and grants were awarded retroactively--that is, the starting dates preceded the date of award by as much as 10 months--and adequate criteria against which to measure tribal performance were not always included. Supervision and monitoring of contracts and grants were not effective in identifying and helping improve poor tribal performance. In addition BIA had not developed a management reporting system that provided the information needed to help monitor contract and grant activities.

WHY CONTROLS ARE NEEDED

As Indian tribes move to take over the planning, conducting, and administering of programs and services now provided by BIA, it is important that BIA establish controls to insure that (1) the service given to Indian beneficiaries of the particular program or function operated by the tribe under a contract or grant agreement is satisfactory, (2) protection of trust resources is assured, and (3) the program or function is properly maintained and completed. In fiscal year 1977, Indian self-determination contracts and grants awarded to Indian tribes accounted for about 25 percent of the BIA budget for the operation of Indian programs.

Although neither the act nor regulations define the extent of control BIA should maintain after a contract or grant is awarded, various sections of the act clearly mandate that tribal performance under contracts and grants must be supervised and monitored. Section 109 states that if BIA:

> "* * * determines that the tribal organization's performance under such contract or grant agreement involves (1) the violation of the rights or endangerment of the health, safety, or welfare of any persons; or (2) gross negligence or mismanagement in the handling or use of funds provided to the tribal organization * * *[BIA] may * * * rescind such contract or grant agreement and assume or resume control or operation of the program * * *."

The implementing regulations include similar provisions.

QUESTIONABLE AWARD OF RETROACTIVE CONTRACTS AND GRANTS

In order to properly supervise and monitor tribal performance over the period to be covered by a contract or grant agreement, the contract and grant agreement should include specific requirements against which to measure tribal performance, and each proposal should be submitted and approved by BIA before the proposed starting date. However, tribes were not always submitting their proposals for contracts and grants before the proposed starting date. This situation has resulted in the award of retroactive contracts and grants and reimbursements to tribes for expenses incurred before proposals are submitted to and approved by BIA. Contracts and grants are being awarded to cover periods even before the date tribal councils meet and vote on resolutions to ask for a contract or grant.

In our review of the Indian Self-Determination Act and relevant regulations we found no provision authorizing or prohibiting the award of contracts in which the starting date of the contract precedes the date of award. BIA appeared to be accepting, without questioning, any starting date proposed by the tribe. However, we noted BIA's Procedural Guidelines on 25 CFR 271 states as follows:

> "The proposed starting date can be any time after the application is approved for contracting and negotiations have been completed. However, when the contract may result in the displacement of Bureau personnel * * * the starting date of the contract may be delayed up to 120 days after the application is received."

We found that this guideline was not being followed. This may have resulted in part because contract regulations for implementing the act did not include this provision 1/. Also, we did not find any example where BIA questioned the starting date proposed by the tribe.

We also question the management efficiency of such awards. Award of retroactive contracts and grants creates a situation where Federal funds are paid after the fact for tribal services over which there was no Federal control.

1/25 CFR, ch. 1, part 271, Contracts Under Indian Self-Determination Act; and 41 CFR, ch. 14H, part 14-H-70, Contracting With Indian Organizations Pursuant to the Indian Self-Determination and Education Assistance Act.

Retroactive award occurs in two different circumstances. In some instances tribes had a previous contract with BIA, either under the Indian Self-Determination Act or under another contracting authority. In other instances there was no contractual relationship before award of the self-determination contract. Two examples of such contracts follow.

On May 9, 1977, a tribal council met to vote on a resolution requesting a contract to continue operating the judicial program it had been operating under a prior contract with BIA. The resolution proposed that the contract cover the period October 1, 1976, to September 30, 1977. On May 10, 1977, the BIA agency superintendent recommended to the area director that the contract be approved and that one of his staff be designated as contract officer representative to supervise the contract. The contract was signed by BIA on July 6, 1977, just 86 days before the end of the fiscal year when the contract was due to expire.

On February 14, 1977, a tribal council met to vote on a resolution requesting a contract with BIA for partial operation support of an elementary school. The resolution proposed that the contract cover fiscal year 1977. On February 15, 1977, the tribe submitted its contract proposal to BIA proposing that the contract period begin on October 1, 1976 (more than 4 months before the tribe met to adopt its resolution), and run to September 30, 1977. On March 18, 1977, the BIA agency superintendent recommended to the area director that the contract be approved. The contract was signed on June 1, 1977, and the BIA acceptance letter was forwarded to the tribe advising it of final execution of the contract and designation of the contract officer's representative responsible for administering the contract.

BIA OFFICIALS NOT SUPERVISING AND MONITORING CONTRACTS AND GRANTS

Although the act clearly mandates that contracts and grants must be supervised and monitored, BIA's procedures and practices were not effective in identifying poor tribal performance or in insuring corrective action.

The regulations and guidelines implementing the act placed primary responsibility for negotiating and administering contracts and grants at the area office level. The central office becomes involved only when the tribe(s) to be served are within the jurisdiction of more than one area office or when the area office declined the tribe's request. BIA's procedural guidelines state that the

contract officer is the BIA official responsible for awarding and administering contracts. Also, the grant officer is responsible for awarding and administering grants.

The contract and grant officer usually designates one or more persons to serve as his authorized representative to assist in administering the contract or grant. The contract and grant officers are the only persons authorized to designate a representative, and the designation must be in writing.

The procedural guidelines state that other than the contract officer or his representative, persons dealing with a contractor are not authorized to commit BIA or to imply BIA commitment or to monitor the activities of the contractor. Although the contract officer may delegate certain contract administration duties to his representative, he remains the BIA official responsible for making sure that BIA and the contractor comply with the terms and conditions of the contract.

BIA's procedural guidelines state that the contract officer representative's written designation should relate the representative's specific authority, duties, and responsibilities to the provisions of the contract he is expected to administer and enforce.

Duties not defined

Six of the seven contract and grant officer representatives we interviewed at the three area offices were agency employees and all had been designated by a form letter. However, none of the letters clearly defined their duties or related them to specific contract or grant provisions. Because their duties were not clearly defined, the contract and grant officer representatives often did not routinely visit the contractor's and grantee's working sites, evaluate and report on tribal performance, or review supporting documentation before they certified payment of tribal expense invoices.

None of the three area offices had developed supplemental instructions concerning the duties of the representatives; the designation letter is the only guidance provided to the representatives. Only one of the seven representatives we interviewed had ever met with the contract or grant officer concerning their responsibilities. Also, the contract and grant officers at the three area offices stated that they had never met many of the representatives who were supposed to supervise their contracts and grants.

Part-time supervision

Contract and grant officer representatives supervise and monitor contracts and grants as part-time, collateral duties. Officials at the area offices we visited said that the supervision duties were added to the full-time responsibilities of BIA employees designated as contract or grant officer representatives. Consequently, every representative had at least two supervisors--the regular supervisor (immediate or otherwise) and the contracting officer.

The representative deals directly with the contract or grant officer on contract and grant matters; whereas, all other duties are still under the regular supervisor's direction. One area contract officer said that the representative's immediate supervisor occasionally prevented the representative from accomplishing some contracting duties. This occurred because priority was placed on the regular full-time assignment rather than on contracting. Of the seven representatives we interviewed, six told us they did not have enough time for all their supervisory and monitoring duties because their regular responsibilities required most of their time.

Conflict of interest

Some contract and grant officer representatives, in addition to their full-time duties at BIA, also work directly for tribes. For example, one representative was a member of the tribe awarded the contract he was required to supervise and monitor, and he also worked as the tribe's planning director. This makes it very difficult for him to perform his supervisory and monitoring duties objectively.

Little training

Contract and grant officer representatives had not been adequately trained to perform their duties. Several BIA officials stated that the representatives needed training in contract and grant administration because they were program rather than contract specialists; consequently, they were not experts in monitoring and evaluating grant or contract performance. They stated that some representatives did not fully comprehend their duties. Also, two representatives said that they did not feel they could adequately evaluate tribal performance. For example, one representative stated that he did not understand how the tribe managed its grant activities, and as a result he could not criticize tribal grant performance due to his lack of training in grant administration.

EFFECTS OF INADEQUATE SUPERVISION AND MONITORING OF CONTRACTS AND GRANTS

The three cases discussed on the following pages demonstrate the effects of inadequate supervision and monitoring of contracts and grants. In each case the supervision and monitoring was ineffective in identifying and improving tribal performance. As a result, control over tribal performance was not adequate.

Higher education contract

One tribe had operated a higher education scholarship program under yearly BIA contracts awarded under the Buy Indian Act (25 U.S.C. 47) since 1972. The tribe's management of the higher education scholarship program had been severely criticized by the tribe's own auditor, first in a March 1975 report and again in a January 1976 report. The 1975 report stated that 144 students were overpaid a total of $161,330. In addition, the audit report cited evidence of poor management practices such as disorganized and duplicate files, scholarship awards to ineligible applicants, and questionable uses of scholarship funds by the recipients. The report concluded that no improvements could be expected until "such time as a complete reorganization of the Scholarship Office has been effected, including both systems, procedures and staffing." The 1976 report stated that the auditors found no improvement since the 1975 audit.

On October 1, 1976, BIA awarded a contract to the tribe to operate the higher education scholarship program under the Indian Self-Determination Act for fiscal year 1977. This contract was awarded even though evidence available to BIA in the tribe's auditor's report showed that the tribe had not been able to properly maintain and complete the program as required by the act. Also, the evidence raised serious questions concerning the tribe's negligence and mismanagement in the handling and use of funds.

In fiscal year 1977 the tribal scholarship office served over 2,000 students and administered funds from various sources amounting to over $7 million. Of that amount, BIA furnished $4.1 million in fiscal year 1977 and estimated that fiscal year 1978 funding would amount to $3.8 million.

BIA efforts to supervise the contract

The contract officer's representative stated in November 1977 that other than assisting the BIA area auditor in a brief review of the tribal auditor's findings--which confirmed the tribe's findings--no further effort had been made to determine if the deficiencies were corrected. The contract officer representative stated that her full-time job was in employment assistance and that someone in education more familiar with handling these problems should have been designated to monitor the contract. She also said that in addition to her regular duties she was the area women's coordinator and equal opportunity officer. She pointed out that to properly supervise and monitor such a large contract would demand more time than she had. She said that, as a result, she had not been able to evaluate the operation of the scholarship office or review the documents supporting reimbursement invoices submitted by the tribe. She stated that she did not know how to make the scholarship office correct the discrepancies noted in the reports. She further stated that she had never met with the area contract officer to discuss her duties and responsibilities and did not recall receiving any guidelines on the duties of a contract officer representative, other than her appointment letter until she attended a seminar in July 1977 which discussed the general duties of contract officer representatives.

BIA's efforts to obtain corrective action

The assistant area director for administration said that to induce the tribe to improve its performance the area director had considered cutting off contract funds until the deficiencies cited in the tribe's audit reports were corrected. A letter drafted on January 24, 1977, by the BIA area auditor for the area director's signature proposed that

> "* * * the funding for this contract for the second half of FY 1977 be predicated on the development and implementation of a sound system of internal controls within the Scholarship Office * * * which will insure the complete, timely, and accurate processing of scholarship applications/awards."

However, the auditor's proposed letter was not used. Instead, the area director, in a February 2, 1977, letter to the tribe, deleted the auditor's proposal to hold up funds and substituted the following language:

"It is our opinion that improvements are needed in internal controls within the Scholarship office * * * to insure the complete, timely, and accurate processing of scholarship applications/awards."

The contract officer's representative stated that she did not know anything about either letter. The contract officer stated that he did not know anything about the threat to withhold funds but that he was aware of the critical audits before the contract was awarded to the tribe under the Indian Self-Determination Act. He said that he was not personally involved in the contract negotiations, which were handled by a contract specialist who is no longer a BIA employee.

He stated that he could not have declined a contract under the act on the basis of the critical audit reports because the tribe had been operating the program under a contract since 1972. Instead, he would have had to invoke the cancellation for cause provisions under the conditions and in accordance with the procedures set forth in the regulations. He stated that canceling a contract for cause was a very difficult measure for BIA to take because, in effect, all the tribe had to do was present BIA with a plan to correct the deficiencies, thereby removing the cause for cancellation. He said there was no serious consideration given to canceling the contract for cause because it was his opinion that such an effort would not succeed.

BIA interest in upgrading the tribe's performance apparently lagged after the area director's letter to the tribe. The contract officer's representative and the auditor both stated that they made no further efforts to determine whether the deficiencies were corrected. On July 28, 1977, the tribe formally applied to recontract the program for fiscal year 1978, with no reference in the application to the reported audit deficiencies. BIA acknowledged receipt of the application on August 2, 1977, and criticized the tribe for submitting it late but made no mention of the need to correct the reported deficiencies.

Concerning the current status of tribal performance, we were advised in a November 1977 meeting with the area director, assistant area directors, and other area office officials that they did not know what the current situation was or whether the deficiencies noted by the tribal auditors had been corrected. We believe the lack of BIA action in this case is unacceptable and that immediate action is needed by the Secretary of the Interior to correct the management deficiencies that foster such problems.

Tribal work experience program contract

On October 1, 1976, a tribe was awarded a $554,817 contract under the Indian Self-Determination Act to manage and operate a tribal work experience program. Under the program, eligible welfare recipients can earn $1 an hour in addition to their welfare payment by working on various community projects. The contract required the tribe to prepare a written plan of operation for the program covering the period of the contract. The contract also required that (1) once a participant's eligibility was determined, the contractor review and reestablish eligibility at least once every 6 months, (2) the contractor arrange for a variety of meaningful work and training projects, (3) the contractor submit an annual summary report on the contract, a written quarterly progress report, and a final report on each completed work project.

The contract officer's representative stated that except for the annual and quarterly reports none of the above requirements were met. He said that instead of providing meaningful work experiences to program participants that would enhance their employability, the program was used mainly to give jobs to older individuals who, due to lack of education, alcoholic background, or other personal problem, could not find other work. He stated that younger, untrained individuals are discouraged from participating in the program because it may not be good exposure for someone who may later have an opportunity for a good job. He stated that he had not reported this matter to the contracting officer and had never met with him to discuss his duties.

The contract officer's representative said that he does not monitor the program, make formal evaluations, or submit reports to the contracting officer. He said he did not have enough time for contract supervision. He also said that in addition to his regular duties and contract supervision duties he is also an unofficial advisor to the tribe on the management of its social services programs, making it difficult for him to objectively rate the tribe's performance.

Strengthening and improving tribal government grant

On September 17, 1976, a tribe was awarded a $46,000 grant to fund a program to strengthen and improve tribal government. In part, the grant was to be used to pay stipends to council members for attending orientation

sessions on such matters as the tribal constitution, law and order code, organizational and functional structure, and parliamentary procedures. In addition, the grant provided for stipends to members of the tribe's constitutional revision task force and for legal assistance to revise the tribe's constitution and update tribal ordinances.

Although the tribe was required to submit monthly expense invoices to BIA, it did not submit any until September 19, 1977. The invoices submitted at that time totaled $13,521 and covered expenses incurred for the period from November 1976 through August 1977. The grant officer's representative stated that he did not know why the tribe waited so long to bill BIA.

Supporting documentation was available for only $4,394 of the expenses shown on the invoices. This documentation showed the following:

--Of $2,645 paid for stipends, $700 was for attending meetings other than those covered by the terms of the grant, such as an enrollment committee meeting, a child abuse workshop, education committee meetings, a tour of the tribe's farming operation, and others of a similar nature. According to the terms of the grant, stipends were to be paid only to (1) council members who attend the orientation sessions and (2) constitution revision task force members who attend task force briefings.

--About $1,600 was for lunches and refreshments for attendees at council orientation sessions although attendees had already been paid $35 a day. Of the $1,600 about $990 was billed to BIA as office supplies.

The grant officer's representative stated that he usually reviewed the supporting documentation for billings on grants but that he probably did not in this case. He agreed that these items should not have been paid under this grant.

He said that he was a member of the tribe and in addition to his BIA duties as reservation programs officer and grant officer's representative, he also served as the tribe's planning director although not by a formal assignment from BIA. The tribal official designated to supervise the grant-related activities is assigned to the

tribe's Office of Planning and Evaluation, which the grant officer's representative directs in his unofficial role as the tribe's planning director. This situation creates a conflict of interest and makes it difficult for the grant officer to be objective.

CONCLUSIONS

Although neither the act nor regulations define the extent of control BIA should exercise over programs and services administerd by tribes under contracts and grant agreements, the act clearly mandates that tribal performance under contracts and grants be supervised and monitored. However, BIA has not met this mandate even though self-determination contracts and grants in fiscal year 1977 accounted for about 25 percent of BIA's budget for the operation of Indian programs.

In some instances adequate criteria against which to measure tribal performance were not always included in contracts and grants and some were being awarded in which the starting dates preceded the date of award by as much as 10 months. This makes it almost impossible to supervise and monitor tribal performance.

BIA guidelines do not adequately define the duties of BIA employees assigned responsibility for supervising and monitoring contracts. This fact along with the designation of employees at the agency level to monitor and supervise contracts and grants has created a situation which makes it difficult for contract and grant officer representatives to effectively supervise and monitor tribal performance. They are required to perform their contract and grant officer representative duties as part-time collateral duties with very little training, and because they work for or closely with the tribes on many matters, they are not able to maintain the independence needed to effectively supervise and monitor tribal performance. The tribes, because of their influence on agency operations, can make it very difficult for contract and grant officer representatives to be objective.

BIA has not established a management reporting system that can identify individual contracts and grants or describe the activities carried out under the contracts and grants. As a result, information management needed to help monitor and evaluate self-determination activities is not available.

RECOMMENDATIONS

We recommend that the Secretary of the Interior direct the Assistant Secretary for Indian Affairs to develop a management reporting system to help monitor and control self-determination contracts, grants, and training and technical assistance activities. (Discussed in ch. 3.) The Assistant Secretary should also be directed to revise BIA's policies, regulations, procedures, and practices as appropriate to:

--Prohibit award of contracts in which the starting date precedes the date of award.

--Require that all contracts and grants include specific criteria against which to measure performance.

--Require that contracts and grants are effectively supervised and monitored by contract and grant officers. This should include (1) designation of full-time contract and grant officer representatives at the area level rather than agency level in order to remove conflict of interest, (2) clear description of contract and grant officer representative responsibilities, and (3) adequate training of contract and grant officer representatives.

CHAPTER 3

TRAINING AND TECHNICAL ASSISTANCE

FUNDS USED FOR OTHER PURPOSES

BIA uses training and technical assistance funds appropriated by the Congress for self-determination services for purposes other than those necessary to implement the Indian Self-Determination Act. The act intended that training and technical assistance to tribes should be directly related to increasing the tribes' capability to contract for programs now provided by BIA and to helping tribes overcome problems that could cause BIA to decline requests for contracts. However, BIA provides technical assistance that has no bearing on the tribes' capability to contract under the provisions of the act. Further, some tribal programs were funded with training and technical assistance funds where regular program funds should have been used. Also, BIA does not have a management reporting system to help monitor and control area office use of these funds.

PURPOSE OF FUNDS

Section 102(b)(2) of the act requires BIA to provide assistance to help tribes overcome any problems preventing tribes from obtaining contracts under the act. BIA, in implementing regulations, broadened this requirement for assistance into a mandate to provide technical assistance to tribes under a number of circumstances, including the following:

--Preapplication technical assistance to assist tribes in (1) determining the appropriateness of contracting, (2) developing a program design and plan of operation, (3) preparing technical parts of the contract application, and (4) such other ways as may be requested.

--At any point in the contract and grant application review process where a reviewing official finds problems that may result in a declination.

--When a BIA decision to decline is not appealed, or is upheld on appeal.

--When the contracting officer finds problems that could result in a declination or cannot resolve the problems in a tribe's request to revise or amend a contract.

--When BIA officials are considering canceling a contract or grant for cause.

--When a tribe requests assistance in preparing applications for grants.

In January 1977 BIA issued a policy guidance memorandum on the use of training and technical assistance funds. In that memorandum BIA stated that funds will be used for the following purposes to meet the mandate of the act:

--Training BIA personnel in (1) the art of providing technical assistance, (2) grant and contract administration and monitoring, and (3) the personnel aspects of the act.

--Training tribal representatives on the provisions of the act.

--Technical assistance requested by the tribes which would enhance their ability to contract for Federal programs, strengthen tribal government, especially the managerial capability, and enable them to use the personnel options under the act.

--Enable tribes to give direction to Federal programs by planning, designing, monitoring, and evaluating the programs.

ALLOCATION OF FUNDS

Table 1 shows the training and technical assistance funds allocated to BIA area offices for fiscal years 1976 (including the transitional quarter) and 1977. The allocations were determined by the number of eligible tribes within the area office's jurisdiction. In addition to these allocations, in fiscal year 1977 each area office was allocated funds for self-determination staff expenses plus an additional $40,000 as a result of BIA decisions to cancel plans for a national technical assistance contract.

Table 1

Area office	Fiscal year 1976	1977
Aberdeen	$ 70,000	$ 281,000
Anadarko	70,000	286,000
Billings	60,000	260,000
Minneapolis	70,000	311,000
Phoenix	90,000	305,000
Albuquerque	70,000	283,000
Sacramento	100,000	352,000
Eastern	70,000	287,000
Navajo	50,000	212,000
Portland	80,000	306,000
Juneau	100,000	385,000
Muskogee	70,000	286,000
Area total	$ 900,000	$3,554,000
Central Office	200,000	909,000
Total	$1,100,000	$4,463,000

Because BIA does not have a management reporting system to help monitor and control the use of training and technical assistance funds, it does not know how these funds are being used. We requested the central office and three area offices we visited to compile a list from their records showing how training and technical assistance funds were used. These lists are shown in Appendix I.

For fiscal year 1977 BIA was authorized 48 positions for the purpose of providing self-determination services to Indian tribes. Table 2 shows how these positions were distributed between the central office and each area office. It also shows the positions filled and the allocations for self-determination staff expenses.

Table 2

Area office	Positions Authorized	Positions Filled	Staff resources allocated
Aberdeen	3	3	$ 70,000
Anadarko	2	a/ 8	75,000
Billings	3	2	72,000
Minneapolis	3	2	100,000
Phoenix	3	1	45,000
Albuquerque	3	3	72,000
Sacramento	3	2	68,000
Eastern	2	0	76,000
Navajo	1	1	50,000
Portland	3	3	60,000
Juneau	4	1	101,000
Muskogee	3	3	75,000
Area total	33	29	$ 864,000
Central Office	15	4	158,000
Total	48	33	$1,022,000

a/This area office reclassified six vacant positions to be used for self-determination activities.

QUESTIONABLE USE OF FUNDS

At the area offices we visited, training and technical assistance funds appropriated for self-determination services, in three cases discussed below, were used for purposes other than helping tribes develop the capability to contract under the act or overcome problems leading to BIA declination of contracts.

Contract with a university

One area office used training and technical assistance funds in awarding a contract for $150,000 to a university to provide training and technical assistance to area tribes. The scope of the contract was broad enough to cover almost any type of assistance a tribe might request. As a result, technical assistance provided by several of the projects initiated under the contract was not related to increasing the tribe's capability to negotiate and administer contracts for programs and services provided by BIA. One such project involved a tribe which requested that BIA provide them with guidance in the operation of its agriculture farming

enterprises. The area office referred the request to the university, which reported that the assistance requested dealt with how to control Johnson grass, a noxious weed that had become a problem in cultivating the tribal cotton crops. The university's staff suggested a method of Johnson grass control, referred the tribe to a chemical company, and prepared for the tribe an operational budget for the remainder of the crop season. The cost for these services had not been reported at the time of our review.

Declining farm income resulted in a request from another tribe for assistance with its farming enterprises. The area office also referred this request to the university. The university trained the tribe in the maintenance of the greenhouse and physical plant and equipment used in its environmental farming operation. The local BIA agency has proposed that training and technical assistance funds be used to pay the university about $90,000 per year to provide this service to the tribe on a year-round basis.

An area office official stated that on December 15, 1977, a central office official advised him that economic development projects, such as the two projects involving the tribes' agricultural enterprises, should not have been funded under the training and technical assistance contract with the university. He said that the area office had been operating under a very liberal interpretation of what constituted allowable training and technical assistance.

Grant for a drought impact area office

An area office made a grant to a tribe for $45,000 to establish a drought impact area office. The office was to coordinate relief and recovery assistance to drought impacted areas, establish permanent liaisons with agencies and institutions that deal with the problems caused by drought, promote water and soil conservation, and secure financial and technical assistance from governmental agencies and private groups. The drought impact office was apparently established as a permanent program, and training and technical assistance funds should not have been used to fund its operation. An area official stated that because BIA's guidelines were not clear, the area office took a rather liberal interpretation of what constituted allowable technical assistance.

Contract for a fisheries management program

An area office awarded a contract in December 1976 to a group of confederated tribes to conduct a fisheries

management program. Funds for this contract came from three sources:

Indian Services - Self-Determination Services:	
Training and Technical Assistance Funds	$31,000
Contract Support Funds	13,330
Tribal Resources Development - Wildlife and Parks:	
Investigations and Planning	10,400
	$54,730

The contract did not provide for training and technical assistance but instead stated that the contractor would provide personnel, materials, equipment, supplies, and services to perform activities required in carrying out the program. An area office official stated that BIA guidelines were not clear and that the training and technical assistance money should not have been used for this contract.

CONCLUSIONS

Area offices we visited were, by their own admission, interpreting very liberally how training and technical assistance funds could be used. As a result, funds were used for purposes that had no bearing on a tribe's capability to contract under the provision of the act or the problems which could lead to BIA declining tribal contracts. Also, because BIA had not developed a management reporting system to help monitor and control contracts, grants, and training and technical assistance activities, BIA had no way of knowing whether funds were being used properly. We believe a management reporting system could be a valuable tool in identifying questionable uses of funds, such as those noted at the area offices we visited.

RECOMMENDATIONS

We recommend that the Secretary of the Interior direct the Assistant Secretary for Indian Affairs to revise its guidelines to prevent training and technical assistance funds appropriated for self-determination purposes from being used for assistance that does not help tribes (1) develop the capability to negotiate and administer self-determination contracts and grants or (2) improve their managerial and governmental capabilities required to fully exercise their

self-determination options. In chapter 2 we recommended that the Assistant Secretary be directed to develop a management reporting system to help monitor and control self-determination contracts, grants, and training and technical assistance activities.

CHAPTER 4

INFORMATION ON HOW TRIBAL OVERHEAD RATES ARE DETERMINED

The authority to contract is useful to the extent that adequate funds are made available to the tribe to operate the contract. The regulations define the funds to which tribes are legally entitled, what additional funds may be available for the contract, and how the specific amount of funds for each contract will be determined. The funds to which tribes are entitled for a contract include (1) funds BIA would have otherwise provided for direct operation of the program if it was not contracted and (2) overhead funds (indirect costs). Because of increasing congressional concern over control of overhead costs, this chapter discusses, at the request of the Chairman's office, how allowable overhead costs are determined and how the overhead rates used to apply the costs to contracts are negotiated.

OVERHEAD COSTS

Currently, BIA provides separate funds, to the extent appropriated, to cover the additional costs of contracting BIA programs with tribal organizations. These funds are made available in addition to direct program funds to prevent program deterioration. Although BIA has separate funds for this purpose, other Federal agencies generally do not. Therefore, their share of any indirect costs will necessarily be financed out of the direct program funds allocated to their grant or contract.

Indirect costs are those which are: (1) incurred for a common or joint operation benefiting more than one program function or contract and (2) not readily assignable to the programs or contracts receiving the benefit. Indirect costs are usually collected in one or more pools and later assigned to the benefiting functions or contracts in a way that will distribute them fairly in relation to the benefits received from the common or joint operations. Although indirect costs are reimbursable under a contract, the agreement to pay such costs must be included in the contract document.

Costs incurred under a contract may be reimbursed either as indirect costs or direct costs, but they cannot be paid as both. A specific cost may be either direct or indirect, depending on how the benefits derived from the cost can be allocated to the program. For example, if

100 percent of the benefit can be identified directly to the program, the cost should be allocated as a direct cost. If it is difficult or impossible to identify the direct benefit to the program, then the cost is logically considered an indirect cost. The final determination whether a specific cost will be reimbursed as an indirect or a direct cost will be made at the time the indirect cost rate is negotiated.

OVERHEAD RATE NEGOTIATIONS

The Office of Audit and Investigation, Department of the Interior, is responsible for negotiating indirect cost rates. Proposals may be submitted directly to the Office of Audit and Investigation or through the contracting officer.

The existence of a negotiated indirect cost rate under a Federal program is not an absolute guarantee that the rate will be granted under other Federal programs. Some Federal assistance programs have specific limitations on the amount of indirect costs which can be paid. In such cases, any indirect cost rate established in negotiation with the Department of the Interior, if higher than the rate paid under other Federal programs, will not apply to those other Federal programs. In addition, contract officers and grant administrators of other Federal agencies are not legally obligated to accept the rate negotiated by Interior. At their discretion, they have the option to negotiate a different rate.

To determine how rates were negotiated and whether they were negotiated in accordance with prescribed regulations, we reviewed rate negotiation practices of the Western Region of the Office of Audit and Investigation. We did not find any deficiencies in the manner in which rates were negotiated and, except as discussed later, the auditors appeared to be following prescribed regulations.

We found that the regulations controlling allowable costs of BIA grants and contracts were developed with few changes from Office of Management and Budget Circular 74-4, "Cost principles applicable to grants and contracts with State and local governments." The intent of the Circular was to provide uniform principles for determining allowable costs of grants and contracts with State and local governments for all Federal agencies. Thus, tribal overhead rates were to be established using virtually the same principles used in determining overhead rates for other Federal contractors.

In those cases where a tribe obtains funds from several Federal agencies, the tribe usually negotiates its overhead rate with only one of the agencies. This rate is then applied to all Federal contracts and grants unless another Federal agency elects to negotiate a separate rate. Interior, however, accepts the rates negotiated by other Federal agencies.

The only difference in rate negotiations between Interior and other Federal agencies was that Interior allowed some tribal officer salaries and expenses as part of indirect costs, whereas other Federal agencies did not because of legal restrictions. For BIA contracts awarded before September 1977, this resulted in those tribes negotiating overhead rates with Interior obtaining higher rates than those tribes negotiating rates with other Federal agencies. In September 1977 Interior met with other Federal agencies and reached agreements which provided that in the future each agency would negotiate two overhead rates--one including tribal officer salaries and expenses and one excluding salaries and expenses. In the future, the rate to be applied to all BIA contracts with tribes will include tribal officer salaries and expenses.

HOW TRAINING AND TECHNICAL ASSISTANCE FUNDS WERE USED BY THE CENTRAL OFFICE

Fiscal year 1976 and transition quarter

Type of training and technical assistance	Amount
Travel	$ 169
Miscellaneous	59
Contracts	256,652
Total	$256,880

Fiscal year 1977

Orientation and training--BIA and tribes	
United Indians--'638' Film	$ 53,594
Sterling Institute--'638' Seminar	6,750
BIA--Internal Training	28,500
Technical assistance to tribes	
U.S. Civil Service Commission--Dallas	84,843
U.S. Civil Service Commission--Denver	49,000
ACKCO/RJAssoc.--Equal Employment Opportunity Study	24,000
Association on American Indian Affairs--Dean-Legal	151,804
National Congress on American Indians--Workshop	72,000
National Congress on American Indians--Legislative Service	22,000
U.S. Civil Service Commission--Seattle	17,000
American Indian Lawyer training program	50,000
Planning, implementation, and audit	
Planalysis Corporation--Evaluation Planning	19,540
BIA - Planning Support Group--Survey	20,000
BIA - Guidelines Preparation	10,000
BIA - Audit Program	44,000
BIA - Inter-Governmental Office	1,000

APPENDIX I

Type of training and technical assistance	Amount
Central Office operations	
Staff	$ 85,000
Equipment	15,000
Travel	25,000
Salary adjustment	46,000
Intermountain adjustment	18,000
Program Reserve	65,609
Total	$908,640

HOW TRAINING AND TECHNICAL ASSISTANCE FUNDS WERE USED BY THE NAVAJO AREA OFFICE

Fiscal year 1976 and transition quarter

Type of training and technical assistance	Amount
Public Law 93-638 Orientation for 51 BIA employees and 69 tribal employees	$27,175

Fiscal year 1977

Public Law 93-638 training workshops:	
for contract specialists (BIA-6, tribe-1)	$ 660
for tribal employees (49 trainees)	5,030
Public Law 93-638 coordinators workshop (BIA-1)	171
Grant: Paralegal and management training project Office of the Prosecutor (Navajo tribe)	11,085
Grant: Development tribal resource management capacity	94,864
Grant: Establish Navajo Nation Drought Impact Office	45,000
Tribal Law and Order Seminar, tribal police (BIA-1, tribe-3)	539
Tribal Law and Order Seminar, judicial (tribe-1)	200
Top Management Seminar, tribal managers (tribe-25)	13,562
Safety conference for tribal safety officers (number of attendees not determined)	256

Type of training and technical assistance	Amount
Contract administration seminar for BIA managers (number of attendees not determined)	$ 10,000
Trip to Ruidoso, NM, for Navajo tribal council to observe the economic development programs of the Mescalero Apache tribe (number of attendees not determined)	13,000
Judicial training for tribal judiciary committee (tribe-5)	2,000
American Indian Law Seminar, tribal prosecutors (tribe-8)	1,251
Withdrawal of funds for operation of Intermountain School	6,000
Management by Responsibility Seminar for BIA managers (number of attendees not determined)	3,750
Contract Administration Seminar for Contract Officers' Representatives	5,300
Total	$212,668

HOW TRAINING AND TECHNICAL ASSISTANCE FUNDS WERE USED BY THE PHOENIX AREA OFFICE

Fiscal year 1976 and transition quarter

Type of training and technical assistance	Amount
Grants to 23 tribes for financial management assistance ($2,000 to each tribe)	$ 46,000
Two Public Law 93-638 Orientation Seminars, by contract with Sterling Institute (168 participants)	47,880
Total	$ 93,880

Fiscal year 1977

Training and technical assistance contract with the University of Arizona	$150,000
Grant: Improvement of tribal accounting system - Ute Indian Tribe	30,520
Grant: Tribal Administration Program and Planning Project - Fallon Paiute-Shoshone Tribe	11,960
Reprogrammed for operation of Intermountain School	9,000
Grant: Implementation and evaluation of the Financial Management System, Cocopah Tribe	17,160
Grant: Public Law 93-638 Consultant Services, Fort Mojave Indian Tribe	14,000
Public Law 93-638 training, two Papago Tribe employees	1,500

APPENDIX I

Type of training and technical assistance	Amount
Contract with Sterling Institute to develop a tribal enrollment training course	$ 64 436
Administration:	
Salary, Public Law 93-638 coordinator	6,000
Travel	13,000
Total	$317,576

HOW TRAINING AND TECHNICAL ASSISTANCE FUNDS WERE USED BY THE PORTLAND AREA OFFICE

Fiscal year 1976 and transition quarter

Type of training and technical assistance	Amount
Salaries, travel, equipment, etc. for area office staff	$ 27,040
Public Law 93-638 training, Northern Idaho Agency BIA staff	900
Grant to Inter-tribal Policy Board, coordination and administration of inter-tribal activities, grants and programs	4,000
Training of Nez Perce Tribal employees in support of grant application	12,500
Training of Coeur d'Alene tribal employees in support of grant application	10,000
Technical assistance to Colville Tribe to prepare proposal to Law Enforcement Assistance Administration for developing a law enforcement program	5,800
Developing a comprehensive financial management system for the Makah Tribe	13,640
Purchase Order to Makah Tribe (purpose not determined)	1,500
Funds to Western Washington Agency, tribal operations Branch, to support contract with Tulalip Tribe	3,000
Technical assistance and training to representatives of Idaho tribes in matters related to grants and technical assistance under Public Law 93-638	1,500
Total	$79,880

Fiscal year 1977

Type of training and technical assistance	Amount
Salaries and travel, area office staff	$ 49,672
Office equipment purchased for area office staff	1,313
Communications seminar for tribal leaders and agency staff	9,553
Comprehensive plan dealing with recreation site Kalispel Tribe	4,800
Special film on filling out forms and specifications for Public Law 93-638	3,165
Public Law 93-638 contracting seminar by Sterling Institute	2,500
Contract with Kalispel Tribes (purpose not determined)	18,000
Columbia River treaty tribes contract to conduct a fisheries management program for tribes	31,000
Contract with Confederated Tribes of the Warm Springs Reservation of Oregon to provide training and technical assistance in community planning and tribal government to board members of the Celilo Village Wyam Board	11,898
Grant to Stulaquamish Tribe, Management systems	5,000
Grant to Stulaquamish Tribe, Enrollment System	5,000
Grant to Colville Tribe, technical assistance for Housing and Urban Development programs	10,000
Grant to Quinault Tribe, pilot education in Indian issues program	40,000
Grant to Snoalwater Bay Tribe, Intergovernmental relations program	4,000

APPENDIX I

Type of training and technical assistance	Amount
Contract with Umatilla Tribe (purpose not determined)	15,000
Communications seminar for tribal leaders and tribal editors	18,187
Grant to Quinault Tribe, Intergovernmental relations program	2,500
Technical assistance to Coeur d'Alene Tribe in support of grant	960
Grant to Burns Paiute Tribe, assessment and strengthening tribal management system (training and technical assistance)	16,850
Grant to Quinault Tribe, Intergovernmental relations program	8,000
Grant to Umatilla Tribe, Intergovernmental relations program	7,500
Grant to Umatilla Tribe, Tribal Management Training and Improvement Program	9,860
Funds reprogrammed for operations of Intermountain School	9,000
Grant to Yakima Tribe, Tribal Records System	20,000
Training program, Department of Housing and Urban Development Housing Contract (contractor not determined)	5,000
Total	$308,758

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